



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WK  
F. #2016R01805

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 5, 2019

**By Email and ECF**

All Counsel on Attached Appendix A

Re: United States v. Jeffrey Chartier, et al.  
Criminal Docket No. 17-372 (JS)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

The government has made the following materials available at First Choice Copy ("First Choice") for reproduction to the defendants:

SOURCE	DESCRIPTION	BATES BEGDOC - ENDDOC
Wells Fargo	Records for account No. *****7317 (Marketbyte) from December 2012 through September 2017	EDNY-PTP_000509538 - EDNY-PTP_000509841

Defense Counsel

April 5, 2019

Page 2

Where affidavits concerning the authenticity of business records are included herein or in previous discovery productions, per Federal Rules of Evidence 803(6) and 902(11) the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

By:                     /s/                      
Whitman G.S. Knapp  
Assistant U.S. Attorney  
(718) 254-6107

cc: Clerk of the Court (JS) (by ECF)

**APPENDIX A: DEFENSE COUNSEL**

Robert P. LaRusso, Esq.  
LaRusso Conway & Bartling LLP  
300 Old Country Road, Ste. 341  
Mineola, New York 11501

David S. Smith, Esq.  
Smith & King, LLC  
666 Old Country Road, Ste. 305  
Garden City, New York 11530

Stephen Lloyd Brounstein, Esq.  
Steve L. Brounstein, PLLC  
32 Court Street, Ste. 408  
Brooklyn, NY 11201

Kevin J. Keating, Esq.  
Law Office of Kevin J. Keating  
666 Old Country Road, #501  
Garden City, New York 11530

Michael H. Gold, Esq.  
350 Fifth Avenue Ste. 6800  
New York, NY 10118

Steve Zissou, Esq.  
Steve Zissou & Associates  
42-40 Bell Blvd., Ste. 302  
Bayside, NY 11361

John F. Kaley, Esq.  
Doar Rieck Kaley & Mack  
217 Broadway, Ste. 707  
New York, New York 10007

Randy Scott Zelin, Esq.  
Randy Scott Zelin PC  
110 East 59th Street  
New York, NY 10022

Ira Lee Sorkin, Esq.  
Mintz & Gold LP  
600 Third Avenue, 25th Floor  
New York, NY 10016

Joseph W. Ryan, Jr., Esq.  
Melville Law Center  
225 Old Country Road  
Melville, New York 11747-3111

Avraham C. Moskowitz, Esq.  
Moskowitz & Book, LLP  
345 Seventh Avenue, 21st Floor  
New York, New York 10001

Lloyd J. Nadel, Esq.  
Lloyd J. Nadel PLLC  
170 Old Country Road, Ste. 600  
Mineola, NY 11501

Steven Goldsobel, Esq.  
Law Offices of Steven Goldsobel  
1901 Avenue of the Stars  
Los Angeles, California 90067

James Darrow, Esq.  
Federal Public Defenders  
770 Federal Plaza  
Central Islip, NY 11722

Christopher Bruno, Esq.  
Bruno & Degenhardt, P.C.  
10615 Judicial Drive, Ste. 703  
Fairfax, VA 22030

John S. Wallenstein, Esq.  
Law Office of John S. Wallenstein  
1100 Franklin Avenue, Ste. 100  
Garden City, New York 11530